

UNITED STATES OF AMERICA)
)
 v.) **Case No:**
)
 FRANK GEORGE FREEDMAN)

did use a facility and means of interstate and foreign commerce, to wit: the internet, to attempt to knowingly persuade, induce, and entice an individual known to the Grand Jury as Girl A, who had not attained the age of 18 years, to engage in prostitution and sexual activity for which the defendant can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2422(b).

COUNT TWO: [18 U.S.C. § 2422(b)]

The Grand Jury charges that:

Between on or about the 14th day of February, 2011 and including on or about the 3rd day of March, 2011, in Jefferson County, within the Northern District of Alabama, and elsewhere, the defendant,

FRANK GEORGE FREEDMAN,

did use a facility and means of interstate and foreign commerce, to wit: the internet, to attempt to knowingly persuade, induce, and entice an individual known to the Grand Jury as Girl B, who had not attained the age of 18 years, to engage in prostitution and sexual activity for which the defendant can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2422(b).

COUNT THREE [18 U.S.C. § 2422(b)]

The Grand Jury charges that:

Between on or about the 14th day of February, 2011 and including on or about the 3rd day of March, 2011, in Jefferson County, within the Northern District of Alabama, and elsewhere, the defendant,

FRANK GEORGE FREEDMAN,

did use a facility and means of interstate and foreign commerce, to wit: the internet, to attempt to knowingly persuade, induce, and entice an individual known to the Grand Jury as Girl C, who had not attained the age of 18 years, to engage in

prostitution and sexual activity for which the defendant can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2422(b).

COUNT FOUR: (18 U.S.C. § 2423(b) and (e))

The Grand Jury charges:

On or about the 3rd day of March, 2011, in the Northern District of Alabama and elsewhere, the defendant,

FRANK GEORGE FREEDMAN,

did knowingly travel in interstate commerce from the State of Georgia to the State of Alabama for the purpose of attempting to engage in illicit sexual conduct with another person, known to the Grand Jury as Girl A, in violation of Title 18, United States Code, Section 2423(b) and (e).

COUNT FIVE: (18 U.S.C. § 2423(b) and (e))

The Grand Jury charges:

On or about the 3rd of March 2011, in the Northern District of Alabama and elsewhere, the defendant,

FRANK GEORGE FREEDMAN,

did knowingly travel in interstate commerce from the State of Georgia to the State of Alabama for the purpose of attempting to engage in illicit sexual conduct with another person, known to the Grand Jury as Girl B, in violation of Title 18, United States Code, Section 2423(b) and (e).

COUNT SIX: (18 U.S.C. § 2423(b) and (e))

The Grand Jury charges:

On or about the 3rd day of March, 2011, in the Northern District of Alabama, and elsewhere, the defendant,

FRANK GEORGE FREEDMAN,

did knowingly travel in interstate commerce from the State of Georgia to the State of Alabama for the purpose of attempting to engage in illicit sexual conduct with another person, known to the Grand Jury as Girl C, in violation of Title 18, United States Code, Section 2423(b) and (e).

NOTICE OF FORFEITURE
[18 U.S.C. § 2428]

1. The allegations contained in Counts One through Six of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2428.

2. Pursuant to Title 18, United States Code, Section 2428, upon conviction of an offense in violation of Title 18, United States Code, Section 2422, as alleged in Counts One through Three of this Indictment, or Title 18, United States Code, Section 2423 as alleged in Counts Four through Six of this Indictment, the defendant,

FRANK GEORGE FREEDMAN,

shall forfeit to the United States of America any property, real or personal, that was

used or intended to be used to commit or to facilitate the commission of the offense and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense. The property to be forfeited includes, but is not limited to, the following:

- a. one red 1995 Toyota Tercel with VIN#JT2EL55D350069380;
 - b. one Verizon Model VX5600 Cellular Telephone assigned telephone number (912)585-6347 and MEID-A0000021CC1ECC; and,
 - c. two computers that were seized from the defendant's residence in Vidalia, Georgia.
3. If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREMAN OF THE GRAND JURY

JOYCE WHITE VANCE
United States Attorney

/s/Daniel J. Fortune
DANIEL J. FORTUNE
Assistant United States Attorney